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6 UNITED STATES DISTRICT COURT  
7 WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 AMAZON CONTENT SERVICES LLC, a  
10 Delaware corporation, PENGUIN RANDOM  
11 HOUSE LLC, a Delaware corporation, LEE  
12 CHILD, SYLVIA DAY, JOHN GRISHAM, C.J.  
13 LYONS, DOUG PRESTON, JIM  
14 RASENBERGER, T.J. STILES, R.L. STINE,  
15 MONIQUE TRUONG, SCOTT TUROW,  
16 NICHOLAS WEINSTOCK, AND STUART  
17 WOODS,

18 Plaintiffs,

19 v.

20 KISS LIBRARY d/b/a KISSLY.NET,  
21 WTFFASTSPRING.BID, LIBLY.NET, and  
22 CHEAP-LIBRARY.COM, RODION  
23 VYNNYCHENKO, ARTEM  
24 BESSHAPOCHNY, and DOES 1-10,

25 Defendants.  
26  
27

NO. 2:20-cv-01048-MJP

JOHN GOLDMARK DECLARATION  
IN SUPPORT OF MOTION FOR  
DEFAULT JUDGMENT

I, John A. Goldmark, declares as follows:

1. I am a partner at Davis Wright Tremaine LLP (“DWT”) and am counsel for Plaintiff Publishers Amazon Content Services LLC (“Amazon”) and Penguin Random House LLC (“PRH”), and Plaintiff Authors Lee Child, Sylvia Day, John Grisham, C.J. Lyons, Doug Preston, Jim Rasenberger, T.J. Stiles, R.L. Stine, Monique Truong, Scott Turow, Nicholas Weinstock, and Stuart Woods (collectively, “Plaintiffs”) in this matter. I make this declaration

1 based on personal knowledge, publicly-available databases and information, and records my  
2 firm keeps in the regular course of business, and I could testify competently to the same.

3 **Defendants Infringed Fifty-Two of Plaintiffs' Protected Works**

4 2. Through a ring of related websites, Defendants Kiss Library, Rodion  
5 Vynnychenko, and Artem Besshapochny repeatedly copied, displayed, and/or distributed  
6 Plaintiffs' copyright-protected works without authorization. As alleged in the Complaint,  
7 Plaintiffs initially identified the following seventeen example registered works that Defendants  
8 infringed, *see* Compl. ¶ 41(a)-(q) & Ex. D:

- 9 i. *A Dark Mind*, authored by T. R. Ragan in 2013 with exclusive ebook  
10 distribution rights held by Amazon, registered with the United States Copyright  
11 Office under Registration Number TX0007728631 in 2013, and sold by  
12 Defendants without license at <https://kissly.net/book/77131c36d643ec519ca7>;
- 13 ii. *Abducted*, authored by T. R. Ragan in 2012 with exclusive ebook distribution  
14 rights held by Amazon, registered with the United States Copyright Office under  
15 Registration Number TX0007670441 in 2013, and sold by Defendants without  
16 license at <https://kissly.net/book/26496177a96ffafedb29>;
- 17 iii. *Afterburn*, authored by plaintiff Sylvia Day in 2013, registered with the United  
18 States Copyright Office under Registration Number TX0008280509 in 2016,  
19 and sold by Defendants without license at  
20 <https://kissly.net/book/884ea6a173f6ef1e51cb>;
- 21 iv. *As Long As She Needs Me: A Novel*, authored by plaintiff Nicholas Weinstock in  
22 2000, registered with the United States Copyright Office under Registration  
23 Number TX0005380194 in 2001, and sold by Defendants without license at  
24 <https://libly.net/book/0310008cf18e86efaa748a959b1bee70>;
- 25 v. *Blood on the Tracks*, authored by Barbara Nickless in 2016 with exclusive  
26 ebook distribution rights held by Amazon, registered with the United States  
27 Copyright Office under Registration Number TX0008334746 in 2016, and sold

- by Defendants without license at  
<https://libly.net/book/ff78f1ab2e22252213b63f663c1ce35c;>
- vi. *Fight Dirty*, authored by plaintiff C.J. Lyons in 2014, registered with the United States Copyright Office under Registration Number TX0008076233 in 2015, and sold by Defendants without license at  
<https://kissly.net/book/70924dc73c193608db30;>
- vii. *Jesse James: Last Rebel of the Civil War*, authored by plaintiff T.J. Stiles in 2002, registered with the United States Copyright Office under Registration Number TX0005703845 in 2003, and sold by Defendants without license at  
<https://cheap-library.com/book/45a5e2748d39bf66d745ec5d524a327c;>
- viii. *My Sister's Grave*, authored by Robert Dugoni in 2014 with exclusive ebook distribution rights held by Amazon, registered with the United States Copyright Office under Registration Number TX0008009209 in 2015, and sold by Defendants without license at <https://kissly.net/book/f20671f38204d4377d3a;>
- ix. *Persuader*, authored by plaintiff Lee Child in 2002, registered with the United States Copyright Office under Registration Number TX0006919613 in 2008, and sold by Defendants without license at  
<https://libly.net/book/269e66ebcd734ca6b01fac34637c8404;>
- x. *Red Rain: A Novel*, authored by plaintiff R.L. Stine in 2012, registered with the United States Copyright Office under Registration Number TX0007603027 in 2012, and sold by Defendants without license at  
<https://kissly.net/book/9f40292160d1e5ec973a;>
- xi. *Short Straw*, authored by plaintiff Stuart Woods in 2006, registered with the United States Copyright Office under Registration Number TX0006465649 in

2006, and sold by Defendants without license at

<https://libly.net/book/004468203eb63a73ef7d0a9b7b51c921;>

xii. *The Book of Salt*, authored by plaintiff Monique Truong in 2003, registered with the United States Copyright Office under Registration Number TX0005745355 in 2003, and sold by Defendants without license at

<https://libly.net/book/fcc7849251aa267dabe39d8c213d426c;>

xiii. *The Brilliant Disaster: JFK, Castro, and America's Doomed Invasion of Cuba's Bay of Pigs*, authored by plaintiff Jim Rasenberger in 2011, registered with the United States Copyright Office under Registration Number TX0007373794 in 2011, and sold by Defendants without license at

<https://kissly.net/book/926424dfcc894f32e522;>

xiv. *The Burden of Proof*, authored by plaintiff Scott Turow in 1990, registered with the United States Copyright Office under Registration Number TX0002844794 in 1990, and sold by Defendants without license at

<https://libly.net/book/1f956ace7c3a059de2806d64f5b697ff;>

xv. *The Litigators*, authored by plaintiff John Grisham in 2011, registered with the United States Copyright Office under Registration Number TX0007494080 in 2012, and sold by Defendants without license at

<https://kissly.net/book/f5c9eb68224569c4a5e6;>

xvi. *Tyrannosaur Canyon*, authored by plaintiff Doug Preston in 2004, registered with the United States Copyright Office under Registration Number TX0006206315 in 2005, and sold by Defendants without license at

<https://libly.net/book/9f4390dc6a171679e50029d5727b7e23;> and

xvii. *You Are Not Small*, authored by Anna Kang and illustrated by Christopher Weyant in 2014 with exclusive ebook distribution rights held by Amazon, registered with the United States Copyright Office under Registration Numbers

TX0007970793 and TX0007970795 in 2015, and sold by Defendants without license at <https://kissly.net/book/29cfeb176b308057ad2c>.

3. In addition to the above example works, Plaintiffs' continued investigation uncovered another thirty-five additional registered works by the Plaintiff Authors that Defendants copied, displayed, and/or distributed without authorization:

- i. *Custer's Trials: A Life on the Frontier of a New America*, authored by plaintiff T.J. Stiles in 2015, registered with the United States Copyright Office under Registration Number TX0008229466 in 2016, and sold by Defendants without license at <https://kissly.net/book/8bcd4ce9f29c4998958>;
- ii. *The First Tycoon: The Epic Life of Cornelius Vanderbilt*, authored by plaintiff T.J. Stiles in 2008, registered with the United States Copyright Office under Registration Number TX0006942463 in 2009, and sold by Defendants without license at <https://libly.net/book/c6dd6b742bd226f9ba846ee650b717b6>;
- iii. *Hollow Bones*, authored by plaintiff C.J. Lyons in 2013, registered with the United States Copyright Office under Registration Number TX0007754956 in 2013, and sold by Defendants without license at <https://kissly.net/book/07bebedbdb1e57e27ee1>;
- iv. *Lucidity*, authored by plaintiff C.J. Lyons in 2010, registered with the United States Copyright Office under Registration Number TX0007610805 in 2012, and sold by Defendants without license at <https://kissly.net/book/46c2536b25b21ce82bc2>;
- v. *One L: The Turbulent True Story of a First Year at Harvard Law School*, authored by plaintiff Scott Turow in 1988, registered with the United States Copyright Office under Registration Number TX0002573137 in 1989, and sold by Defendants without license at <https://kissly.net/book/a9ec2cb93926ec1ee42a>;
- vi. *Carnal Curiosity*, authored by plaintiff Scott Turow in 2013, registered with the United States Copyright Office under Registration Number TX0007909225 in

- 2014, and sold by Defendants without license at  
<https://kissly.net/book/8692da620e5f04e97a95>;
- vii. *Chiefs: A Novel*, authored by plaintiff Stuart Woods in 1981, registered with the United States Copyright Office under Registration Number TX0000719822 in 1981, and sold by Defendants without license at  
<https://kissly.net/book/34479515ed7424ce30d3>;
- viii. *Collateral Damage*, authored by plaintiff Stuart Woods in 2013, registered with the United States Copyright Office under Registration Number TX0007684917 in 2013, and sold by Defendants without license at  
<https://kissly.net/book/06655aa180290487631a>;
- ix. *Cut and Thrust*, authored by plaintiff Stuart Woods in 2013, registered with the United States Copyright Office under Registration Number TX0007943843 in 2014, and sold by Defendants without license at  
<https://kissly.net/book/2c24ee7e2e3a4dbec83d>;
- x. *D.C. Dead*, authored by plaintiff Stuart Woods in 2011, registered with the United States Copyright Office under Registration Number TX0007478430 in 2012, and sold by Defendants without license at  
<https://kissly.net/book/69d391391cd26b1ed496>;
- xi. *Foreign Affairs*, authored by plaintiff Stuart Woods in 2015, registered with the United States Copyright Office under Registration Number TX0008233410 in 2015, and sold by Defendants without license at  
<https://kissly.net/book/46597dc15d2b28ef46fd>;
- xii. *Hothouse Orchid*, authored by plaintiff Stuart Woods in 2009, registered with the United States Copyright Office under Registration Number TX0007056077 in 2009, and sold by Defendants without license at  
<https://kissly.net/book/ebccc5f7b4cad2e1f6fc>;

- 1           xiii.   *Insatiable Appetites*, authored by plaintiff Stuart Woods in 2014, registered with  
2           the United States Copyright Office under Registration Number copyright  
3           number TX0008027684 in 2015, and sold by Defendants without license at  
4           <https://kissly.net/book/86bacbfc73fd0957cb86>;
- 5           xiv.   *Iron Orchid*, authored by plaintiff Stuart Woods in 2005, registered with the  
6           United States Copyright Office under Registration Number TX0006295537 in  
7           2005, and sold by Defendants without license at  
8           <https://kissly.net/book/3d2a5992471bca95ec5c>;
- 9           xv.    *Orchid Beach*, authored by plaintiff Stuart Woods in 1998, registered with the  
10          United States Copyright Office under Registration Number TX0004894963 in  
11          1998, and sold by Defendants without license at  
12          <https://kissly.net/book/aa446746eaba735031e3>;
- 13          xvi.   *Orchid Blues*, authored by plaintiff Stuart Woods in 2001, registered with the  
14          United States Copyright Office under Registration Number TX0005465649 in  
15          2001, and sold by Defendants without license at  
16          <https://kissly.net/book/3d36076655adf8b8485f>;
- 17          xvii.   *Palindrome*, authored by plaintiff Stuart Woods in 1990, registered with the  
18          United States Copyright Office under Registration Number TX0003038167 in  
19          1991, and sold by Defendants without license at  
20          <https://kissly.net/book/19d38436b95e03f1f080>;
- 21          xviii.   *Santa Fe Dead*, authored by plaintiff Stuart Woods in 2007, registered with the  
22          United States Copyright Office under Registration Number TX0007172693 in  
23          2008, and sold by Defendants without license at  
24          <https://kissly.net/book/1e57255b6d54338912ac>;
- 25          xix.    *Santa Fe Edge*, authored by plaintiff Stuart Woods in 2010, registered with the  
26          United States Copyright Office under Registration Number TX0007328233 in  
27

2010, and sold by Defendants without license at

<https://kissly.net/book/ce9cb274cd97a55992a5>;

xx. *Santa Fe Rules*, authored by plaintiff Stuart Woods in 1991, registered with the United States Copyright Office under Registration Number TX0003367425 in 1992, and sold by Defendants without license at

<https://kissly.net/book/aaaf87de7b33f24638a9>;

xxi. *Shoot Him If He Runs*, authored by plaintiff Stuart Woods in 2006, registered with the United States Copyright Office under Registration Number TX0006903331 in 2008, and sold by Defendants without license at

<https://kissly.net/book/332b988109a79c77c271>;

xxii. *Two Dollar Bill*, authored by plaintiff Stuart Woods in 2004, registered with the United States Copyright Office under Registration Number TX0006164181 in 2005, and sold by Defendants without license at

<https://kissly.net/book/533cfcd05435786780ec>;

xxiii. *Unintended Consequences*, authored by plaintiff Stuart Woods in 2012, registered with the United States Copyright Office under Registration Number TX0007739500 in 2013, and sold by Defendants without license at

<https://kissly.net/book/a531a091712594d217f7>;

xxiv. *Unnatural Acts*, authored by plaintiff Stuart Woods in 2011, registered with the United States Copyright Office under Registration Number TX0007529029 in 2012, and sold by Defendants without license at

<https://kissly.net/book/8692da620e5f04e97a95>;

xxv. *Swimming to Catalina*, authored by plaintiff Stuart Woods in 1997, registered with the United States Copyright Office under Registration Number copyright number TX0004751854 in 1998, and sold by Defendants without license at

<https://kissly.net/book/332b988109a79c77c271>;



- xxvi. *Dead Eyes*, authored by plaintiff Stuart Woods in 1994, registered with the United States Copyright Office under Registration Number TX0003864784 in 1994, and sold by Defendants without license at <https://kissly.net/book/3722b74525b7003b4dd4>;
- xxvii. *Dead in the Water: A Novel*, authored by plaintiff Stuart Woods in 1997, registered with the United States Copyright Office under Registration Number TX0004579095 in 1997, and sold by Defendants without license at <https://kissly.net/book/1c0d6044681ec5e13fb3>;
- xxviii. *Bitter in the Mouth*, authored by plaintiff Monique Truong in 2010, registered with the United States Copyright Office under Registration Number TX0007299541 in 2010, and sold by Defendants without license at <https://kissly.net/book/3a276d21e60ef10db122>;
- xxix. *Gray Mountain: A Novel*, authored by plaintiff John Grisham in 2014, registered with the United States Copyright Office under Registration Number TX0007964170 in 2015, and sold by Defendants without license at <https://kissly.net/book/2bfd6bfabb170436eb91>;
- xxx. *Rogue Lawyer*, authored by plaintiff John Grisham in 2015, registered with the United States Copyright Office under Registration Number TX0008229453 in 2016, and sold by Defendants without license at <https://kissly.net/book/b7d38fd29b1ac7ac69ac>;
- xxxi. *Sycamore Row*, authored by plaintiff John Grisham in 2012, registered with the United States Copyright Office under Registration Number TX0007791381 in 2013), and sold by Defendants without license at <https://kissly.net/book/3097a68b013581243a1e>;
- xxxii. *Theodore Boone: The Abduction*, authored by plaintiff John Grisham in 2010, registered with the United States Copyright Office under Registration Number

TX0007413142 in 2011, and sold by Defendants without license at

<https://kissly.net/book/88b594378597563b28a0>;

xxxiii. *Theodore Boone: The Accused*, authored by plaintiff John Grisham in 2011, registered with the United States Copyright Office under Registration Number TX0007558149 in 2012, and sold by Defendants without license at <https://kissly.net/book/b347872e0bc1aa74f35d>;

xxxiv. *Theodore Boone: The Fugitive*, authored by plaintiff John Grisham in 2014, registered with the United States Copyright Office under Registration Number TX0008293865 in 2016, and sold by Defendants without license at <https://kissly.net/book/39af6434fb6f33e63321>; and

xxxv. *Jennie*, authored by plaintiff Doug Preston in 1994, registered with the United States Copyright Office under Registration Number TX0003921292 in 1994, and sold by Defendants without license at <https://kissly.net/book/e1e20503bf4387ab2902>.

4. Attached as Exhibit A is a true and correct summary of Plaintiffs' fifty-two registered works infringed by Defendants, consisting of the seventeen example works identified in the Complaint plus the thirty-five additional works uncovered in continued investigation.

#### **Defendants Engaged in Deception and Spoliation**

5. Plaintiffs' investigation revealed that Defendants employed multiple fake names and addresses in operating their ring of websites, including by obscuring the actual registrant(s) and website operator(s) of those sites. *See* Compl. ¶ 38 ("[T]he contact information provided by Defendants on their websites are intentionally misleading and false, intended to obscure their true identities, contact information, and activities."). In addition to the fake information detailed in the Complaint, *see id.* ¶ 38(a)-(d), Plaintiffs' investigation uncovered further examples of Defendants' use of false and deceptive contact information, particularly in registering the various website domains they used to operate their piracy scheme.

1           6.       Beginning with the original kisslibrary.com, Defendants provided false  
2 addresses in registering the website. For example, Defendant Vynnychenko listed **Milutenka**  
3 **3, Apt. 1, Kiev, Ukraine 02156** as his address in registering kisslibrary.com. *See* Dkt. 24 Ex. D  
4 at 38-39. But Vynnychenko could not be found there for contact or service, and notably, he  
5 immediately deregistered that address when Plaintiffs attempted service for this suit, and  
6 registered a different (also false) address with the Ukrainian government. *See* Dkt. 25 at 2-3;  
7 Dkt. 26 ¶ 8. Ultimately, after hiring private investigators in Ukraine, Plaintiffs confirmed that  
8 both prior addresses provided by Vynnychenko were inaccurate (finding no evidence he ever  
9 resided at either address), and finally uncovered his true address: 13 Demiivska Str., Apartment  
10 83, Kyiv, Ukraine 03039. *See* Dkt. 29 ¶¶ 2-5; Dkt. 31 at 1-2. Similarly, while Defendant  
11 Besshapochny transferred kisslibrary.com's registration to his control at a Kiev address in  
12 October 2017 using the [redoxyzo@gmail.com](mailto:redoxyzo@gmail.com) account, he then used his xpdf.bid-related email  
13 address to re-register kisslibrary.com's website in April 2018 at a non-existent *Kentucky*  
14 *address* with a *New York* zip code: **2772 50th Street, Edmonton, KY 12772**. *See* Dkt. 24 Ex.  
15 D at 39-41.

16           7.       In addition to the initial kisslibrary.com sites, nonparty productions by domain  
17 registrars and service providers show that Defendants continued their pattern and practice of  
18 using fake information with other sites connected to and supporting their scheme. For example,  
19 Defendant Vynnychenko registered the bookpdfs.com domain under the false Milutenko  
20 address in February 2017. And when Defendants reregistered that domain in December 2017  
21 using their redoxyzo@gmail.com email address, they fraudulently listed the registrant as  
22 "Charles J. Philbrook" at a non-existent address: **2129 Bolman Court, Springfield, IL 62707**.  
23 A true and correct copy of those public domain registrations is attached as Exhibit B.  
24 Additionally, Defendant Besshapochny provided a non-existent address, **Ahmatovoi 12, Kyiv,**  
25 **Ukraine 02156**, when registering the xpdf.com domain used to service the kisslibrary.com  
26 domain. A true and correct copy of business records showing user information for  
27

1 Besshachpochny's xpdf.com registration produced by domain registrar and nonparty NameCheap  
2 Inc. is attached as Exhibit C.

3 8. After filing their Complaint, which identified multiple websites distributing  
4 Plaintiffs' works or redirecting users to those infringing sites, *see* Compl. ¶ 38(a)-(d)  
5 (kisslibrary.com, kisslibrary.net, kissly.net, libly.net, cheap-library.com, wtffastspring.bid,  
6 kisslibraryemails.com); Dkt. 4 ¶ 9, Plaintiffs obtained records related to those websites through  
7 expedited discovery authorized by the Court. *See* Dkt. 10 at 7. Beyond the routine use of  
8 deceptive contact information, Plaintiffs' investigation and nonparty discovery uncovered  
9 evidence that Defendants had requested that their service providers delete records relating to  
10 Defendants in the days after Plaintiffs filed their suit. For example, shortly after this suit was  
11 filed, Defendants attempted to delete all financial records from their payment processor,  
12 FastSpring. As shown by FastSpring's business record and log of communications for the  
13 serviced websites, Defendants "request[ed] immediate erasure of personal data concerning me  
14 according to Article 17 GDPR," as well as the removal of their "merchant account and erasure  
15 of] all personal data concerning me" following the filing of Plaintiffs' July 2020 lawsuit. A  
16 true and correct copy of FastSpring's business record produced in discovery is attached as  
17 Exhibit D (also showing notice of "piracy complaints from authors" by FastSpring to  
18 Defendants in September 2019).

19 9. Shortly after the Complaint was filed in July 2020, Defendants also sent  
20 multiple requests through different service emails to Cloudflare, a nonparty website service  
21 provider, attempting to delete and purge Cloudflare's business records related to Defendants'  
22 websites. These requests appear as a "ZONE\_DELETE" or "ZONE\_PURGE" event request in  
23 Cloudflare's log file. A true and correct copy of Cloudflare's business record for user  
24 15257449 (dmitriy.chernyay@gmail.com) attempting to delete information related to  
25 Defendants' websites (libly.net, 2pdfs.com) is attached as Exhibit E. A true and correct copy  
26 of Cloudflare's business record for user 4550270 (redoxzyo@gmail.com) attempting to delete  
27 information related to fourteen of Defendants' websites is attached as Exhibit F. A true and

1 correct copy of Cloudflare’s business record for user 9163573 (robert.teifeld@gmail.com)  
2 attempting to delete information related to six of Defendants’ websites is attached as Exhibit G.  
3 A true and correct copy of Cloudflare’s business record for user 4258144  
4 (sofleadecen1987@mail.ru) attempting to delete information related to kissly.net is attached as  
5 Exhibit H.

6 10. Although unsuccessful as to some third-party service providers, Defendants  
7 were able to delete and spoliage evidence regarding their primary email addresses that serviced  
8 the Kiss Library scheme: redoxyz@gmail.com, ikmytz@gmail.com, and roddiku@gmail.com.  
9 A true and correct copy of Google’s correspondence confirming that Defendants had “deleted  
10 and purged” these accounts is attached as Exhibit I. Additionally, domain registrar Zoho  
11 Corporation confirmed that Defendants successfully deleted their records possessed by that  
12 registrar and related to the Kiss Library websites on July 9, 2020—just two days after Plaintiffs  
13 filed their complaint. A true and correct copy of Zoho Corporation’s correspondence  
14 confirming the deletion of data and associated dates involving kisslibrary.com,  
15 kisslibraryemails.com, kisslibrary.net, kissly.net, libly.net, cheap-library.com, and other  
16 associated websites is attached as Exhibit J.

17 **Defendants Operated a Ring of Sites in Connection with the Piracy Scheme**

18 11. Through Court-authorized expedited discovery, Plaintiffs investigated and  
19 uncovered additional obfuscated websites related to Defendants’ scheme. As a result, Plaintiffs  
20 enjoined those additional sites in accordance with the Court’s Temporary Restraining Order.  
21 See Dkt. 12 ¶ 6 (identifying additional enjoined sites connected to the scheme, including  
22 books.coffee, getebooks.net, booksgreatchoice.com, maximumbook.org, bsebooks.com,  
23 bookspc.com, crucialbooks.com, osebooks.com, wordered.com, thekissly.net,  
24 kisslibraryemails.net, quabook.com, luckybooks.online). By way of example, nonparty  
25 discovery revealed Defendants’ operation of luckybooks.online, another piracy site involved in  
26 the scheme that distributed unauthorized copies of Plaintiffs’ works. A true and correct copy of  
27 a screenshot of some of Plaintiff Grisham’s works appearing on the luckybooks.online website

1 in August 2020 is attached as Exhibit K. Following entry of the Court's August 27, 2020  
2 Preliminary Injunction Order, *see* Dkt. 15, Plaintiffs further uncovered and investigated other  
3 websites connected to Defendants' copyright piracy schemes, including kissanime.com,  
4 torrentsmoviesfree.com, kissanime.ru, kissmanga.com, bookpdfs.com, xpdf.bid, and  
5 2pdfs.com.

6 12. After continued nonparty discovery, Plaintiffs uncovered additional websites  
7 connected to Defendants' scheme that displayed and offered unauthorized copies of Plaintiffs'  
8 works for sale. Migrating away from the Kiss Library style and associated monikers,  
9 Defendants engaged in a similar and continuing scheme under the SmashBook moniker.  
10 *Compare* <https://web.archive.org/web/20171020201154/http://luckybooks.online/about>  
11 (luckybooks.online in 2017 as a Kiss Library mirror), *with*  
12 <https://web.archive.org/web/20200512130417/https://luckybooks.online/dmca>  
13 (luckybooks.online in 2020 as a SmashBook mirror). Those associated SmashBook sites,  
14 which Plaintiffs have now enjoined or attempted to enjoin through the Court's Order, included  
15 smashbook.site, cybook.club, oregano.pro, dexcom.pro, lumeo.pro, keyhunter.pro,  
16 zenlibrary.top, and lumintu.club. Plaintiffs' investigation revealed that these SmashBook sites,  
17 like the earlier enjoined Kissly sites, were displaying and offering for sale unauthorized copies  
18 of Plaintiffs' works. By way of example, a true and correct copy of a screenshot of some of  
19 Plaintiff Grisham's works appearing on the oregano.pro SmashBook website in October 2021  
20 is attached as Exhibit L.

21 13. Throughout the course of this scheme, Plaintiffs have uncovered the following  
22 email addresses that have operated or serviced Defendants' websites or third party services in  
23 support of those sites: roddiku@gmail.com, sofleadecen1987@mail.ru, kmytz@yandex.ru,  
24 redoxyz@gmail.com, jjpetruninas@gmail.com, robert.teifeld@gmail.com,  
25 ikmytz@gmail.com, hellodorld@protonmail.com, nyakambinnickson@gmail.com,  
26 ravawebsite@gmail.com, tema@xpdf.bid, hgurm80@gmail.com, besshapochnyy@mail.ru,  
27 amankwavictoria11@gmail.com, and dmitriy.chernyay@gmail.com. In addition to these email

addresses, third-party productions obtained by Plaintiffs show that they routinely used others' names, financial accounts, and addresses around the world, including in Ukraine, Poland, Lithuania, Russia, and Canada.

**Notice to Defendants**

14. Plaintiffs effected proper service and notice on Defendant Kiss Library through registered email service as authorized by the Court, and effected proper service and notice on individual Defendants Besshapochny and Vynnychenko in Ukraine in accordance with local law and the Hauge Convention. *See* Dkt. 34 at 2-3.

15. On October 19, 2021, Plaintiffs also sent the Clerk's Notice of Default through registered mail to Defendants' following addresses in Ukraine, which were established as Defendants' proper service addresses during confirmation of service proceedings in accordance with Ukrainian law and the Hague Convention.

**Rodion Vynnychenko**  
13 Demiiivska Str., Apartment 83  
Kyiv, Ukraine 03039

**Artem Besshapochny**  
70 Teatralna Str., Apartment 6  
Kharkiv, Ukraine 63011

16. Despite having been properly served and otherwise demonstrating awareness of these proceedings, *see* Dkt. 19, Defendants have not answered or appeared to defend the claims against them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Seattle, Washington, this 8th day of November, 2021.

By: s/ John A. Goldmark  
John A. Goldmark